



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Ted Schade
Air Pollution Control Officer
Great Basin Unified Air Pollution Control District
157 Short Street
Bishop, California 93514

Dear Mr. Schade:

Thank you for your submission of the Great Basin Unified Air Pollution Control District's (GBUAPCD's) 2012 Ambient Air Monitoring Network Plan. Based on the information provided in the plan, EPA approves all portions of the network plan except those specifically identified below.

Annual network plans are important documents for regulatory purposes (e.g., State Implementation Plans, designations and redesignations) and public information, in addition to the myriad uses by the air districts. EPA is revising the review process for annual network plans to specifically check and document the comprehensive set of items that are required to be included in the annual network plans per 40 CFR 58.10 in a consistent manner. We have created a checklist that lists all these items and have included it as Attachment A. While the items in the checklist are required by EPA regulations, we acknowledge that we have not specifically requested some of this information in previous annual network plan reviews. We recognize that your plan may not have all the items that we have currently identified and hope to work with you on the inclusion of these items in future plans. To facilitate these changes, EPA has provided detailed feedback in the checklist where information should be included or revised in next year's plan.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information, as described, does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has approval authority. Accordingly, we are not acting on the specific portions of your agency's annual network plan listed in Attachment B.

All of the comments in Attachments A and D should be addressed in next year's network plan. If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 972-3851 or Michael Flagg at (415) 972-3372.

Sincerely,

Matthew Lakin, Manager
Air Quality Analysis Office

Enclosures:

- A. Annual Network Plan Checklist
- B. Elements where EPA is Not Acting
- C. Additional Detailed Comments
- D. [Response to Comments?]

cc: Christopher Lanane, GBUAPCD
Karen Magliano, CARB

Attachment B: Annual air monitoring network plan items where EPA is not acting.

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- NCore monitoring requires EPA Administrator approval. Per 40 CFR 58.11(c), NCore network design and changes are subject to approval of the EPA Administrator. Therefore, we are not acting on these items.
- System modifications (e.g., site closures or moves) are subject to approval per 40 CFR 58.14(c). Information provided in the plan was insufficient for EPA to approve the following system modification listed in the plan per the applicable requirement: relocation of the Flat Rock PM₁₀ SLAMS site. Therefore, we are not taking action on this item as part of this year's annual network plan.
- EPA identified items in your agency's annual network plan where a requirement was not being met or information in the plan was insufficient to judge whether the requirement was being met based on 40 CFR 58.10 and the associated appendices. Therefore, we are not acting on the following items:

Item	Checklist Row (Attachment A)	Issue
Date of last two semi-annual PM flow audits	30	Insufficient information to judge
Distance to roadway	62	Insufficient information to judge
Traffic count	63	Insufficient information to judge
Scale of representation	16	Insufficient information to judge
Distance between collocated monitors	33	Insufficient information to judge
Distance from supporting structure	66	Insufficient information to judge
PM _{2.5} monitors represent community wide air quality at neighborhood scale	54	Insufficient information to judge
Population-oriented PM _{2.5} site in area of expected max concentration	55	Insufficient information to judge
PM _{2.5} background/transport site	58	Insufficient information to judge
Document how agency will provide for the review of changes to PM _{2.5} network	22	Insufficient information to judge
Precision and accuracy reports	23	Insufficient information to judge
Data certification	24	Insufficient information to judge
Parameter occurrence code	43	Insufficient information to judge
Sampling and analysis method	13	Insufficient information to judge in some instances
Method code	37	Insufficient information to judge in some instances
Monitor start date	38	Insufficient information to judge
Monitor type	39	Insufficient information to judge
Monitoring objective	40	Insufficient information to judge
Parameter code	42	Insufficient information to judge
Statement of purpose	2	Insufficient information to judge
NCore site information	7	Insufficient information to judge
Frequency of 1-pt QC checks	28	Insufficient information to judge
Date of annual PE audits	29	Insufficient information to judge
Probe material	72	Insufficient information to judge
Residence time	73	Insufficient information to judge

Additional information for each of these items is included in Attachment A.

Attachment C: Additional detailed comments.

- The Coso Junction PM₁₀ site is characterized as “regional scale” on p.7, but listed as “neighborhood” in the site report in Appendix A. Therefore, please correct this discrepancy in next year’s plan.
- The PM₁₀ monitors in the network are currently monitoring at the correct frequency, but information included in the plan is unclear. Please provide the specific operating schedules for each monitor in next year’s plan.
- While the collocation requirement for manual PM₁₀ monitors is currently being met, please include more detailed information concerning the PM₁₀ collocation requirement and specific information on the operating schedules for manual PM₁₀ monitors at the Keeler site.